

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

October 3, 2005

TO: Internal File

THRU: Stephen J. Demczak, Environmental Scientist III/Engineering, Team Lead

FROM: Priscilla W. Burton, Environmental Scientist III/Soils

RE: Full Extraction Pillar 1st South, Consolidation Coal Company, Emery Deep Mine, C/015/015, Task ID #2321

SUMMARY:

Consolidation Coal Co. is amending their plan to indicate full extraction of the First South Panel, because the partial panel extraction resulted in unplanned subsidence due to pillars sinking into an unstable floor. The panel is shown on Plate V-5. The area is not located beneath an alluvial valley floor or beneath prime farmland. To minimize damage to adjacent areas, the Permittee will perform work after allowing time for self-healing and will group sites for work to minimize travel along access roads.

TECHNICAL ANALYSIS:

OPERATION PLAN

SUBSIDENCE CONTROL PLAN

Regulatory Reference: 30 CFR 784.20, 817.121, 817.122; R645-301-521, -301-525, -301-724.

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Analysis:

The Permittee indicates in Chap V, pg 39 that subsidence cracks will be graded and/or backfilled as required to the satisfaction of the three parties involved: DOGM, the Permittee, and the landowner. Currently, the Permittee is filling cracks above the partial pillar extraction area in the First South panel. Best management practices were discussed with the Permittee during review of this amendment, they include allowing time for self healing of cracks and combining repair work to limit travel to the sites during subsidence repair.

Findings:

The information provided meets the requirements of Regulations.

RECOMMENDATIONS:

This amendment is recommended for approval.